



Beck Reed Riden LLP
155 Federal Street | Suite 1302
Boston | Massachusetts 02110
Tel. (617) 500-8660 | Fax (617) 500-8665
BeckReedRiden.com
Russell Beck
Direct: (617) 500-8670
rbeck@beckreed.com

September 14, 2023

VIA ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: Proskauer Rose LLP v. O'Brien, No. 1:22-CV-10918-AT (S.D.N.Y.)

Dear Judge Torres,

We represent Defendant Jonathan O'Brien ("Mr. O'Brien") in the above-referenced case, and we submit this letter on behalf of both parties. In order to allow the parties time to continue actively negotiating in good faith toward a resolution of this matter, and to accommodate competing obligations on both sides, the parties respectfully request a brief extension of two specific deadlines in this case as follows:

- The current deadline for Mr. O'Brien to file his Answer or otherwise respond to the Amended Complaint is September 18, 2023 [ECF No. 102]. The parties request to adjourn this deadline by three weeks, to October 9, 2023.
- The current deadline for Plaintiff Proskauer Rose LLP to respond to Mr. O'Brien's interrogatory requiring identification of trade secrets (§ 6(b)(i), Dkt. 85) is October 19, 2023 [ECF No. 102]. The parties request to adjourn this deadline by three weeks, to November 9, 2023.

The parties are not seeking an extension of any other deadlines at this time.

The parties are making good progress and are hopeful that a resolution can be achieved. However, if the parties are unable to reach a settlement in the next few weeks, they anticipate that they will need to seek extensions of all other deadlines set forth in the revised Case Management Order, which the Court allowed on July 3, 2023 following the expiration of a temporary stay [ECF No. 97].



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We appreciate the Court's consideration of, and attention to, this matter.

Respectfully submitted,
BECK REED RIDEN, LLP

A handwritten signature in blue ink, appearing to read 'Russell Beck', written over the printed name.

Russell Beck

cc: Counsel of Record (via ECF)